

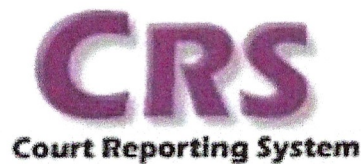
# EXHIBIT E

## **First Judicial District of Pennsylvania**

*171101173*  
*Seal Vs. Seal*

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*Trial (Waiver) Volume 6*  
*November 01, 2019*



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*First Judicial District of Pennsylvania*  
*100 South Broad Street, Second Floor*  
*Philadelphia, PA 19110*  
*(215) 683-8000 FAX: (215) 683-8005*

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[1] IN THE COURT OF COMMON PLEAS  
 [2] FIRST JUDICIAL DISTRICT OF PENNSYLVANIA  
 [3] CIVIL TRIAL DIVISION  
 [4] ---  
 [5] SIMONE A. SEAL : NOVEMBER TERM, 2017  
 [6] : NO: 01173  
 [7] vs.  
 [8] a  
 [9] RIMA VANHILL-SEAL and :  
 [10] RONALD T. SEAL :  
 [11] ---  
 [12] vs.  
 [13] SIMONE A. SEAL and :  
 [14] MATTHEW PEARSON :  
 [15] ---  
 [16] City Hall  
 [17] Room 246  
 [18] Philadelphia, Pennsylvania  
 [19] ---  
 [20] November 1, 2019  
 [21] ---  
 [22] Trial  
 [23] ---  
 [24] BEFORE: THE HONORABLE GLYNNIS HILL  
 [25] ---  
 Jacqueline Froncek,  
 Official Court Reporter

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[1] **APPEARANCES:**  
 [2]  
 [3] Stuard Winegrad, Esquire  
 -- For Simone Seal  
 [4]  
 [5] Nicholas Poduslenko, Esquire  
 -- For Ronald Seal and Rima Vanhill Seal  
 [6]  
 [7] Jonathan Sobel, Esquire  
 -- For Matthew Pearson  
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 [24]  
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[1] **THE COURT:** Counsel, if we could re-call --  
 [2] **MR. PODUSLENKO:** It was Rima Seal.  
 [3] **THE COURT:** Counsel, you were about to cross,  
 [4] I believe.  
 [5] **MR. PODUSLENKO:** No. I had to finish my  
 [6] direct.  
 [7] **THE COURT:** Okay. Thank you.  
 [8] **MR. PODUSLENKO:** And, Your Honor, if  
 [9] permitted, I spoke to Mr. Winegrad, I think we would all  
 [10] like to finish this today.  
 [11] **THE COURT:** We have to. I have another case  
 [12] Monday.  
 [13] **MR. PODUSLENKO:** There are a number of texts  
 [14] and other social media things. What I would like to do is  
 [15] point to it, ask her to identify what it is, read it, and  
 [16] ask her what --  
 [17] **THE COURT:** That is fine. I am going to  
 [18] allow you -- all the parties, actually, a little  
 [19] opportunity to lead today so we can get through this.  
 [20] **MR. SOBEL:** Judge, can I make a request?  
 [21] **THE COURT:** Sure.  
 [22] **MR. SOBEL:** Would it be possible if we took  
 [23] our morning break at around 11:00, so I can make a  
 [24] conference call?  
 [25] **THE COURT:** So you need about five minutes?

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[1] **THE WITNESS:** Yup.  
[2] **BY MR. PODUSLENKO:**  
[3] **Q.** Again, these are more texts that you sent,  
[4] correct?  
[5] **A.** Correct.  
[6] **Q.** And this would have been after the lawsuit was  
[7] filed, correct?  
[8] **A.** Incorrect.  
[9] **Q.** Incorrect?  
[10] **A.** Sorry --  
[11] **Q.** When did you send the texts, sir?  
[12] **A.** Sorry. Which lawsuit do you mean? The lawsuit  
[13] that she filed? Or the lawsuit that was filed against us?  
[14] **Q.** The lawsuit that was filed against you.  
[15] **A.** No. Incorrect.  
[16] **Q.** All right. Was this before or after the lawsuit  
[17] she filed?  
[18] **A.** I don't know. It doesn't have a time. I don't  
[19] know.  
[20] **Q.** And you didn't produce any texts as part of this  
[21] case despite us asking for them, correct?  
[22] **A.** I was not aware I was being asked for texts. You  
[23] have all the texts.  
[24] **Q.** You were not aware that we submitted a request  
[25] for documents to your attorney?

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[1] **A.** Kristin Fromosa.  
[2] **Q.** And it says, "And your uncle isn't innocent  
[3] either. He lied to Simone about adopting her, and she had  
[4] to find out at the courthouse. And your uncle committed  
[5] tax fraud it seemed, hoping Rima collects Simone's money."  
[6] What evidence do you have today that Ron  
[7] committed tax fraud?  
[8] **A.** I don't.  
[9] **Q.** Pardon me?  
[10] **A.** I don't.  
[11] **Q.** So that was not a true statement, correct?  
[12] **A.** That is what I believed at the time. I didn't  
[13] say I said it --  
[14] **Q.** What evidence do you have here today that Ron  
[15] committed tax fraud?  
[16] **MR. SOBEL:** Objection. Asked and answered.  
[17] **THE COURT:** Overruled. You can answer,  
[18] because I heard your last answer. But just answer again.  
[19] Do you have any evidence?  
[20] **THE WITNESS:** No.  
[21] **THE COURT:** All right. Next question.  
[22] **BY MR. PODUSLENKO:**  
[23] **Q.** Exhibit Number 91. Is this a text that you sent  
[24] to Ron?  
[25] **A.** Yes.

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[1] **A.** I mean, I guess.  
[2] **Q.** Well, you guess. Did your attorney ever send you  
[3] a request?  
[4] **MR. SOBEL:** Objection.  
[5] **THE COURT:** I will sustain. Next question.  
[6] **MR. PODUSLENKO:** All right.  
[7] **BY MR. PODUSLENKO:**  
[8] **Q.** Page 13 of D-89.  
[9] **A.** Yup.  
[10] **Q.** And you will see there -- this is dated April  
[11] 7th. Do you see at the top?  
[12] **A.** Yes. April 7th of what?  
[13] **Q.** April 7th. I said at the top.  
[14] **A.** Yup.  
[15] **Q.** That would be 2018 or '19?  
[16] **A.** '18. Definitely not '19.  
[17] **THE COURT:** Hold on one second.  
[18] **BY MR. PODUSLENKO:**  
[19] **Q.** And it says, "And your uncle..." Would that be  
[20] Ron?  
[21] **A.** Yes.  
[22] **Q.** Does this give you a better idea as to who you  
[23] were sending this text to?  
[24] **A.** Yes.  
[25] **Q.** Who were you sending this text to?

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[1] **Q.** And it is dated January 20th, correct?  
[2] **A.** Yes.  
[3] **Q.** And that would be of 2018?  
[4] **A.** Yup.  
[5] **Q.** And please turn to the third page.  
[6] **A.** Yup.  
[7] **Q.** Why would you send these texts to Ron, for  
[8] example, and say the following -- let me just first ask  
[9] you this question, you told Ron on Page 3 of that  
[10] document, "You are also going to find out that your wife  
[11] conspired with Bruce's brother to have him murdered."  
[12] Do you see that?  
[13] **A.** Yes.  
[14] **Q.** And that is not true, right?  
[15] **A.** It seems as if it might be true.  
[16] **Q.** Okay. What evidence, sir, do you have here today  
[17] that Rima conspired with Bruce's brother to have him  
[18] murdered? Evidence.  
[19] **A.** None.  
[20] **Q.** Okay. What evidence did you have when you texted  
[21] Ron? What evidence did you have that, in fact, Rima  
[22] conspired with Bruce's brother to have him murdered?  
[23] **A.** Firsthand witnesses who were there.  
[24] **Q.** What evidence did you have, sir?  
[25] **MR. SOBEL:** Objection.



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[1] **MR. PODUSLENKO:** Not just what people told  
[2] you.  
[3] **MR. SOBEL:** Objection.  
[4] **THE COURT:** Overruled.  
[5] **BY MR. PODUSLENKO:**  
[6] **Q.** What actual evidence did you have that Rima  
[7] conspired with Bruce's brother to have him murdered?  
[8] **A.** None.  
[9] **Q.** And then you say, "He didn't die from the line of  
[10] duty. But lied and had him killed because he was worth a  
[11] shit load of money death." I presume you meant dead,  
[12] right?  
[13] **A.** I would imagine.  
[14] **Q.** You would agree? Not imagine.  
[15] **A.** Yes.  
[16] **Q.** So what evidence do you have today?  
[17] **A.** None.  
[18] **Q.** Okay. And what evidence did you have when you  
[19] wrote this text, sir?  
[20] **A.** His son.  
[21] **Q.** Pardon me? Whose son?  
[22] **A.** Bruce's nephew was --  
[23] **Q.** What evidence do you have, sir?  
[24] **MR. SOBEL:** Judge, he is trying to answer the  
[25] question.

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[1] they should have had concern that the DA and FBI were  
[2] coming after them, correct?  
[3] **A.** Absolutely.  
[4] **Q.** So you would agree that would be something that  
[5] would worry someone that you told that to, correct?  
[6] **A.** I would hope it would worry someone. It is a  
[7] worrying thing.  
[8] **Q.** Is that why you sent it, so they would worry?  
[9] **A.** That is what I believed was still potentially  
[10] possible.  
[11] **Q.** You say potentially possible. Potentially,  
[12] right?  
[13] **MR. SOBEL:** Objection. Is that a question?  
[14] **THE COURT:** Yeah. Your question is --  
[15] **THE WITNESS:** I absolutely believe that.  
[16] **THE COURT:** All right.  
[17] **THE WITNESS:** Whole-heartedly.  
[18] **BY MR. PODUSLENKO:**  
[19] **Q.** Now, take a look at your deposition. In fact, I  
[20] will just read it to you. Page 201, Lines 1 through 13.  
[21] I asked you, "And, in fact, you say he didn't die from the  
[22] line of duty. But lied and had him killed because he was  
[23] worth a shit load of money?" And you say, "Yup."  
[24] Question, "Okay. So have fun explaining that to  
[25] the FBI?" Answer, "Yeah." "Why did you tell him to have

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[1] **THE COURT:** Just answer the question. --  
[2] **MR. PODUSLENKO:** What actual evidence --  
[3] **THE COURT:** What evidence do you have?  
[4] **THE WITNESS:** None.  
[5] **THE COURT:** Thank you. Next question.  
[6] **BY MR. PODUSLENKO:**  
[7] **Q.** Then you say, "Have fun explaining that to the  
[8] FBI and the State of Virginia..."  
[9] **A.** Can I take a look at that text, please?  
[10] **Q.** "Have fun explaining that to the FBI and the  
[11] state of Virginia district attorney when they come home  
[12] for both of you."  
[13] Do you see that?  
[14] **A.** Yes.  
[15] **Q.** So you are basically threatening them and mocking  
[16] them. Hey, have fun when they come.  
[17] **A.** I am not threatening.  
[18] **THE COURT:** Sir, so your answer is no -- what  
[19] is your next question, Counsel?  
[20] **BY MR. PODUSLENKO:**  
[21] **Q.** So that was a matter of fact statement?  
[22] **A.** Yeah.  
[23] **Q.** Pardon?  
[24] **A.** Yeah.  
[25] **Q.** So that was such a matter of fact statement that

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[1] fun explaining to the FBI?" Answer, "Because at that  
[2] point in time, I believe the FBI was going to be  
[3] involved." Question, "But they weren't, were they?"  
[4] Answer, "I don't know."  
[5] That was your answer at your deposition that you  
[6] didn't know whether the FBI was, in fact, involved,  
[7] correct?  
[8] **A.** Wait. If the FBI was involved?  
[9] **Q.** Yes.  
[10] **A.** Yup.  
[11] **Q.** That is what your testimony was, that you didn't  
[12] know at the time that you made that, that the FBI was  
[13] involved, correct?  
[14] **A.** No. I did believe at the time that statement was  
[15] made that the FBI was involved.  
[16] **Q.** I just read through your deposition transcript.  
[17] So --  
[18] **A.** I understand.  
[19] **Q.** So that wasn't true in your deposition?  
[20] **A.** I am honestly a little bit confused as to what  
[21] you are saying at this point.  
[22] **Q.** The question was -- again, let me read it to you.  
[23] I said, "But they weren't, were they?" Answer, "I don't  
[24] know," is what you said.  
[25] **A.** Yes.